



## Roads: traffic reduction

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Author: Louise Butcher  
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This note outlines the targets that successive governments have set to reduce traffic on strategic and local roads. This Note updates Part VI of HC Library research paper [RP 98/16](#) on traffic congestion.

Information on other roads-related issues can be found on the [Roads Topical Page](#) of the Parliament website.

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## 1 Background

In the 1992-97 Parliament there a number of backbench Private Members' Bills and Ten Minute Rules Bills that attempted to impose binding traffic reduction targets on local and national government. Most of these were brought forward by the former Plaid Cymru MP Cynog Dafis. The first such attempt was the *Road Traffic (Reduction) Bill 1993-94*, which was never published, though Mr Dafis did put down an Early Day Motion (EDM) to garner support.<sup>1</sup> Mr Dafis introduced a similar Bill in the 1994-95 session of Parliament under the Ten Minute Rule procedure. This time it was printed and he was able to make a speech in the House;<sup>2</sup> this Bill was also accompanied by an EDM.<sup>3</sup> During his speech, Mr Dafis said:

The Government are committed to the use of economic instruments to achieve environmental targets, the annual 5 per cent. real terms increase in petrol duty figures prominent among them. I would not deny the validity of such instruments, which need to be considered in the context of the vital debate on environmental taxation as against taxation on people and employment. To depend purely and simply on economic instruments would be ineffective, inequitable and damaging to rural areas such as my constituency, where there is currently little alternative to the motor car and where distribution costs are significant.

The Bill, which has been prepared by Friends of the Earth and the Green party, approaches the problem from the other direction. It requires the relevant Secretary of State to draw up a United Kingdom-wide road traffic reduction plan with targets of stabilisation by the year 2000; a 5 per cent. reduction in traffic by 2005; and a 10 per cent. reduction by 2010. Local authorities are required to draw up plans for reducing traffic through measures related to public transport and rail transport, appropriate planning policies, traffic calming, Pedestrianisation and public education.<sup>4</sup>

In March 1996 Mr Dafis introduced another Bill under the same procedure that mirrored his 1994-95 Bill;<sup>5</sup> it was anticipated by another EDM.<sup>6</sup> Again, it proposed that the Secretary of State for Transport adopt an explicit set of targets for reducing road traffic levels over the following sixteen years, so that by 2010 road traffic in the UK would have fallen by 10 per cent from its 1990 level. Local authorities, and parish, town and community councils should they wish, would also draw up plans to reduce road traffic in their own areas. No specific targets were to be set by Parliament for these local initiatives. The Secretary of State would report on the success of the Department's measures to Parliament on an annual basis, and conduct a full review of the plan's effectiveness at least once every three years.<sup>7</sup>

The Conservative Government remained unconvinced of the efficacy of national targets for reducing traffic levels, although it did endorse them at a local level. Its views were set out in its last major transport policy document, *Transport: the way forward*, in April 1996:

The government accepts the need for measures which influence traffic, and reduce traffic growth. But ... the government is not so far convinced that national traffic targets would be practicable. There is too great a risk of imposing costs on society which would not be justified by the benefits produced.

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<sup>1</sup> it gained 31 signatures: [EDM 1520 of session 1993-94](#)

<sup>2</sup> Bill 105 of session 1994-95

<sup>3</sup> it gained 120 signatures: [EDM 839 of session 1994-95](#)

<sup>4</sup> [HC Deb 25 April 1995, cc663-665](#)

<sup>5</sup> Bill 89 of session 1995-96

<sup>6</sup> it gained 211 signatures: [EDM 21 of session 1995-96](#)

<sup>7</sup> [HC Deb 20 March 1996, cc397-400](#)

The government believes a more effective approach is to focus measures directly on the impacts of transport supported, where appropriate, by specific targets for reducing those impacts.

Traffic targets can, however, be a useful and sensible tool for dealing with specific situations at local level and for helping to focus attention on strategies and measures needed. The government will therefore monitor closely the progress which local authorities are making on the greater use of traffic targets and the effects on traffic levels of the measures described elsewhere in the paper.<sup>8</sup>

Later, in January 1997, the then Transport Minister, John Watts, identified four main concerns regarding the introduction of national targets:

- how the wide variation between different parts of the country could be allowed for;
- very few measures could substantially reduce traffic at national level; more measures were available at local level;
- targets based on increasing public transport use would not necessarily have a corresponding effect on reducing traffic; and
- there were already a range of targets that affected the environmental impact of transport, including targets for reducing carbon dioxide emissions and improving air quality.<sup>9</sup>

## 2 Road Traffic Reduction Act 1997

The *Road Traffic Reduction Act 1997* received Royal Assent on 21 March 1997; it came into force in England and Wales on 10 March 2000 and in Scotland on 21 April 2000. The Act began as a Private Member's Bill in the 1996-97 session of Parliament. It was introduced by the Liberal Democrat MP Don Foster in November 1996.<sup>10</sup> The Bill introduced the concept of *local* targets for road traffic reduction but did not identify specific figures; local authorities are expected to set their own targets for reducing either existing levels of traffic, or the anticipated growth of traffic, on local roads.

In the Bill as first printed, the Secretary of State for Transport was not required to set national targets for the reduction in road traffic, although he could set regional targets. This differed from earlier drafts of the Bill that had advocated a national goal of stabilising road traffic at its 1990 level by the year 2000, with subsequent reductions of five per cent by 2005 and ten per cent by 2010. This was removed following discussions between Mr Foster and the then Transport Minister, John Watts. As a result, the Minister gave the Bill conditional support at Second Reading although he indicated then that the Conservative Government would want to see a number of further changes made to the role of central government and the tier of local authority affected.<sup>11</sup>

As it stood at Second Reading, the Bill placed a duty on local authorities to draw up local traffic reduction plans setting targets for reducing or curtailing the growth of different types of traffic in their areas in two stages by 2005 and 2010; and to set out the measures which

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<sup>8</sup> DoT, *Transport: the way forward – the Government's response to the transport debate*, Cm 3234, April 1996, paras 13.24-13.26

<sup>9</sup> [HC Deb 24 January 1997, cc1224-29](#)

<sup>10</sup> [HC Deb 20 November 1996, c994](#)

<sup>11</sup> [HC Deb 24 January 1997, cc1207-29](#)

were, in their opinion, necessary to achieve these targets. The Bill mentioned examples of some of the measures that could be taken, such as traffic calming and pedestrianisation.

Major changes were made to the Bill in Committee.<sup>12</sup> Most fundamentally, the wording of the Bill changed; instead of being a Bill:

...to establish targets for a reduction in road traffic levels in the United Kingdom; to require local authorities to draw up local road traffic reduction plans; to require the Secretary of State to draw up a national road traffic reduction plan to ensure that the targets are met.

It became a Bill: "...to require local authorities to prepare reports relating to the levels of road traffic in their areas".

Instead of requiring local authorities to set a target of a specific reduction by a definite date, for the different types of road traffic, and to set out the measures necessary to achieve those targets, what became section 2 of the Act requires local authorities to review the situation in their areas and, if they consider it appropriate, to prepare a report specifying targets for the reduction of road traffic in their areas. Other details in what were clauses 2, 3, 4 and 5 were deleted from the Bill and were to be included in government guidance.

The guidance was issued in draft form, for consultation, in January 1998.<sup>13</sup> It was envisaged that the 1997 Act would be brought into force in late 1998 and that the final guidance to local authorities on implementing it would follow.<sup>14</sup> Local authorities would be expected to produce reports setting out the results of their reviews of existing and forecast levels of traffic on local roads in their areas and to publish targets to achieve these reductions. Reports were due by July 1999, but the majority of the authorities responding to the consultation did not believe they would be able to meet that date. Authorities were also concerned about the cost of implementing the Act and introducing the transport measures to help them achieve their reduction targets. Eventually, this process was overtaken by the *Road Traffic Reduction (National Targets) Act 1998* (see below).

The 1997 Act was significant as it represented the first time that the reduction of traffic was endorsed in legislation as a general policy, supported by government and all political parties. There was, however, some disagreement as to the effects of the Act; while some argued that it reflected a new way of thinking and a new attitude to the problems of traffic congestion; others were disappointed and argued that the legislation was a compromise, unlikely to be the means of implementing new policies. The Act also has a certain interest as a piece of legislation few would have expected to be passed; the original Bill being drafted by Friends of the Earth and taken up by the Liberal Democrats. It was a marker for the future, as the transport policy of the incoming Labour Government became more engaged with the notion of lessening dependence on the car.

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<sup>12</sup> SC Deb (C), 19 February 1997

<sup>13</sup> [HC Deb 15 January 1998, c258W](#)

<sup>14</sup> [HC Deb 26 January 1998, c16W](#)

### 3 Traffic reduction targets under the Labour Government, 1997-2010

#### 3.1 Road Traffic Reduction (National Targets) Act 1998

Following the election of the Labour Government in May 1997, the former Plaid Cymru MP Cynog Dafis came fifth in the ballot for Private Members Bills in the 1997-98 session of Parliament. In June 1997 he introduced the *Road Reduction (United Kingdom Targets) Bill 1997-98* to introduce national targets into legislation.<sup>15</sup> The Bill received Second Reading in the House of Commons in January 1998;<sup>16</sup> passed Committee stage in March;<sup>17</sup> and Report stage later the same month.<sup>18</sup> It gained Royal Assent as the *Road Traffic Reduction (National Targets) Act 1998* on 2 July 1998.

As it was originally proposed, the Bill stated that the Secretary of State should adopt an explicit set of targets for reducing road traffic levels over the following decade, so that by 2010 road traffic in the UK would fall by 10 per cent from its 1990 level. Critics of the idea of national targets opposed the notion of reducing road traffic miles and argued that any targets set should address the problems caused by excess traffic not the traffic itself (i.e. that targets should tackle the problems of congestion, air quality and noise). The Bill's supporters argued that this would require more targets, whereas one transparent and straightforward target would tackle the root of all these problems – too much traffic. However, following discussions with the Transport Minister at the time, Glenda Jackson, Mr Dafis agreed to a compromise. When the Bill was published, specific targets were omitted from the face of the Bill and there was a proposal to allow the government to use indicators other than road traffic to set targets if it considered that they would be more appropriate for the purpose of reducing the adverse impacts of road traffic. Such 'adverse impacts' were spelt out in the Bill and included such factors as air quality, congestion and accidents.

Other features of the Act include:

- 'Road traffic' is defined as "mechanically propelled vehicles on roads, but excluding vehicles constructed or adapted to carry more than eight passengers in addition to the driver".
- Targets are set separately for England, Scotland and Wales, not for the United Kingdom as a whole. Section 4 allows it to apply to Northern Ireland by Order in Council.
- The Secretary of State is required to set national targets for road traffic reduction in England, Scotland and Wales, and to publish them in a report that should be laid before Parliament. Mr Dafis secured a commitment from the Minister that a report should be available 18 months after the legislation came into force, even though this is not specified in the legislation.
- The Secretary of State may decide not to specify targets if (s)he considers that other targets or measures would be more appropriate for reducing the adverse impacts of road traffic. If the Secretary of State takes such a decision (s)he must explain their reasons for doing so in their report and include an assessment of the impact of these other targets or measures on road traffic reduction.

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<sup>15</sup> this followed [EDM 18 of session 1997-98](#); it gained 347 signatures

<sup>16</sup> [HC Deb 30 January 1998, cc621-685](#)

<sup>17</sup> [SC Deb \(E\), 11 and 19 March 1998](#)

<sup>18</sup> [HC Deb 27 March 1998, cc853-866](#)

- In preparing the report, the Secretary of State must take into account the adverse impacts of road traffic, including those specifically listed in section 2(3) such as: emissions which contribute to climate change; effects on air quality and health; traffic congestion; effects on land and biodiversity; danger to other road users; and other social impacts.
- The Secretary of State must consider the mobility needs of those with disabilities and the need for adequate provision of taxi services in rural and non-rural areas, when considering how to comply with the provisions in the Act.

### 3.2 Introduction of Public Service Agreement targets (PSAs), 1998-2004

The Labour Government's first transport White Paper, published in July 1998, promised to look at the role of national targets in reducing traffic congestion:

We will therefore assess the broad impact on national road traffic levels of the measures we are proposing and, in the light of that assessment, consider how national targets can best help. The question of national targets for road traffic reduction has been debated by Parliament in the context of the Road Traffic Reduction (National Targets) Bill. In considering national targets we will seek advice from the Commission for Integrated Transport, the new independent body that we will set up to review progress on implementing our integrated transport policy.<sup>19</sup>

The White Paper also included proposals for the development of Local Transport Plans (LTPs).<sup>20</sup> This, together with the 1998 Act, overtook much of the work that had been undertaken to implement the 1997 Act (see above) and led to the announcement that:

The consideration of road traffic reduction targets should be an integral part of the process of drawing up local transport strategies, recognising the special circumstances of different authorities and parts of the country. The Government has therefore decided that the statutory reports produced under the provisions of the Road Traffic Reduction Act 1997 should be submitted in July 2000, as part of the first round of full local transport plans. We will expect authorities to submit non-statutory 'interim' road traffic reduction reports in July 1999, as part of provisional Plans.<sup>21</sup>

There was some discussion about whether the government was aiming for a reduction in traffic or a reduction in the *growth* of traffic. In November 1998, the Liberal Democrat MP Tom Brake introduced a Bill to try to clarify this point.<sup>22</sup> In response to a debate the following month, instigated by Mr Brake, the Minister at the time, Nick Raynsford, argued that different measures would be required in different areas, for example in areas of greatest pollution and congestion, an absolute reduction was needed, but in other areas where vehicles were not causing serious pollution, there was no need for absolute traffic reduction.<sup>23</sup>

The government also sought advice from the [Commission for Integrated Transport \(CfIT\)](#), who published a report in November 1999. This drew on initial provisional results from technical work by the Department and consultants WS Atkins on estimated future levels of traffic, congestion and pollution. It also considered the local authorities' interim road traffic reduction reports contained in the provisional LTPs submitted in July 1999. CfIT argued that

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<sup>19</sup> DETR, [A new deal for transport: better for everyone](#), Cm 3950, July 1998, para 2.63

<sup>20</sup> *ibid.*, paras 4.73-4.77

<sup>21</sup> DETR, [Guidance on local transport plans](#), November 1998, paras 134-135

<sup>22</sup> [HC Deb 10 November 1998, cc145-147](#)

<sup>23</sup> [HC Deb 9 December 1998, c253](#)

setting a crude national target for traffic reduction was not the way to tackle congestion and pollution, and that national traffic volume was not a meaningful measure of success in improving the things that matter to people at local level. Among its concerns was that a national target - inevitably an average - could hold back achievements in areas where congestion was most severe.<sup>24</sup>

In January 2000 the government published its first report on the issue of a national traffic reduction target for England, as required by the 1998 Act. The report concluded that:

Our analysis has shown that, even if the measures in A New Deal for Transport are applied very intensively, national road traffic levels would still be well above 1996 levels in ten years' time. Our present judgement is that reducing national road traffic to below 1996 levels is unlikely to be achievable.

We ... are not setting a national road traffic reduction target. The key issue is not the national volume of road traffic but outcomes such as congestion and pollution. A number of outcome targets are already in place or shortly to be published. We recognise that there are some outcomes where more work on indicators and targets is needed, in particular congestion. We will take that forward.<sup>25</sup>

The government proposed developing 'benchmark profiles' rather than targets:

We want to explore the idea of area-based benchmark profiles for congestion which reflect differences in local circumstances. There would need to be widespread support from those implementing transport policies and the wider public to the measures necessary to achieve them. These profiles to guide policy implementation could also form the basis of Government congestion targets for 2010.<sup>26</sup>

The DETR published final guidance for the first round of LTPs was in March 2000. Part III set out the revised guidance on the 1997 Act. The purpose of the guidance was:

... not to constrain authorities unnecessarily from pursuing the approach they consider most suitable in reviewing traffic and the case for targets, as obliged by the RTRA. On the contrary, the government recognises that authorities should have the flexibility to take the characteristics and needs of their area into account in deciding how to proceed. The guidance does, however, identify standards in data collection and forecasting which – while not being a requirement – the government would encourage authorities to adopt in the interests of robust analysis. Details are provided of the generic area, road type and time definitions employed in the department's 1997 road traffic forecasts. Adoption of these definitions by local authorities would assist the secretary of state in taking forward the work on congestion and traffic benchmarks outlined in *Tackling Congestion and Pollution*.<sup>27</sup>

It was intended that the preparation of reports under the 1997 Act would form an "integral part of the process of LTP preparation, recognising the special circumstances of different authorities and parts of the country".<sup>28</sup> The first reports produced under the Act were submitted as part of the first round of full LTPs. The submission of subsequent reports would be linked to future LTP rounds.

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<sup>24</sup> CfIT, *National road traffic targets*, November 1999

<sup>25</sup> DETR, *Tackling congestion and pollution: the government's first report*, January 2000, paras 78-79

<sup>26</sup> *ibid.*, para 80

<sup>27</sup> DETR, *Guidance on full local transport plans*, March 2000, para 322

<sup>28</sup> *ibid.*, para 328

This was followed, in July 2000, by the government's ten year plan for transport which included a new target in the Department's Public Service Agreement (PSA) to reduce road congestion on the inter-urban network and in large urban areas in England below then current levels by 2010 by promoting integrated transport solutions and investing in public transport and the road network. In addition, for local roads it reiterated the Department's commitment to work with local authorities on the development of benchmark profiles for reducing congestion on different types of local roads, and publish a report on the feasibility of such benchmarks by autumn 2001. The benchmark profiles would relate to different areas and reflect different local needs.<sup>29</sup>

The progress report on the delivery of the ten year plan was published in December 2002. This stated that the government remained unconvinced that the PSA congestion target in the ten year plan was a suitable measure. Further, the Department was projecting that congestion would increase, but that the measures in the ten year plan would lead to lower increases than would otherwise be the case:

Our new forecasts suggest that congestion will grow faster than previously assumed, but also that some measures in the Plan could have a bigger effect than previously expected. To reflect the inherent uncertainty in such forecasts, we have presented the results as a range. The latest forecasts suggest that congestion levels on all roads in 2010 could be up 27-32% without the Plan, but by 11- 20% with the Plan. The impact on different parts of the road network varies. For example, on the Strategic Road Network, a forecast growth of 52-67% without the Plan is reduced to 1-15% with the Plan. And for conurbations and large urban areas, growth of 25-30% without the Plan would fall to 9-20% with the Plan. For all roads, these forecasts suggest the Plan could save up to 280 million hours of congestion in 2010.<sup>30</sup>

### 3.3 Revision of PSAs, 2004-08

In July 2004 the Labour Government published its second transport White Paper. This stated that the government was "developing better measures of inter-urban congestion" and would publish a new target by July 2005. It also stated that the Department would publish annual long term projections of congestion.<sup>31</sup> In addition, guidance for the second round of LTPs was published in December 2004. One of the key shared priorities in the guidance was tackling congestion; on targets it said:

The development of effective strategies and targets for tackling congestion should start with an analysis of travel patterns across and within areas in the period to 2011, including projections of changes in patterns of employment and land use. This work should inform, and be informed by, relevant regional and local structural plans. Especially as better sources of data become available, LTPs should include analytical evidence demonstrating that authorities understand the underlying sources of congestion, whether structural (increasing demand for road capacity) or incident-related.<sup>32</sup>

The congestion target for urban roads (PSA 4) was published on 5 July 2005 in the Department's Public Service Agreement. The target was that "by 2010–11, the ten largest urban areas will meet the congestion targets set in their Local Transport Plan relating to movement on main roads into city centres". Local authorities published their second round of

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<sup>29</sup> DfT, *Transport 2010: the ten year plan for transport*, July 2000, annex 2

<sup>30</sup> DfT, *Delivering better transport – progress report*, December 2002, para 7.11

<sup>31</sup> DfT, *The future of transport*, Cm 6234, 20 July 2004, annex B

<sup>32</sup> DfT, *Full guidance on local transport plans: second edition*, December 2004, para 107

LTPs in 2006. The congestion target for strategic roads (PSA 1) was specified in a Technical Note published on 28 July 2005. Both were used in the Department for Transport's 2008 annual report.

However, in October 2007, alongside the Comprehensive Spending Review (CSR), the government replaced the existing seven transport PSAs with four new ones. The two relating to roads are as follows:

**Indicator 1: Journey time on main roads into urban areas**

This indicator relates to journey times on key routes into the ten largest urban areas in the morning rush hour. It therefore covers the times and locations that experience most congestion and are most important to the economy. By calculating person (rather than vehicle) journey times it takes into account the impact of bus services and car sharing. There will be a national target attached to this indicator for 2010-11.

**Indicator 2: Journey time reliability on the strategic road network, as measured by the average delay experienced in the worst 10 per cent of journeys for each monitored route**

The strategic road network enables people and freight to move around the country. The ability to predict when you will arrive is important, so this target focuses on the delay experienced on the worst 10 per cent of journeys (which are significantly slower than typical journeys). By minimising this delay, journeys are made more reliable and people and goods are more likely to arrive on time. Performance will be assessed, in the context of an expected increase in traffic of between 1-2 per cent per year.<sup>33</sup>

The intention behind the new PSAs was to work off the conclusions of the Eddington Study into the role of transport in sustaining the UK's productivity and competitiveness.<sup>34</sup> The new transport PSAs were "specifically focused on the contribution that transport makes to economic growth" with other priorities for the government's transport policy, such as action on climate change, covered separately in other PSA outcomes.<sup>35</sup> In its 2008 report on the Department for Transport's 2007 annual report, the Transport Committee expressed concerns about the new roads-related PSAs:

The new roads PSA targets focus on urban journey times as well as reliability on strategic roads. They largely reprise the previous PSA targets in these areas. The new strategic roads indicator is the same as the previous PSA target for strategic roads, i.e. to improve reliability of journeys on the strategic road network. This is not a very ambitious target, though the DfT has failed to deliver it so far (see below). The new urban roads indicator focuses on journey times, as did the previous urban roads PSA target. As this has not been assessed so far, it is difficult to comment on the worth of this target

[...]

**We are concerned that the Department's approach to its new PSA targets lacks clarity. The new targets do not address the issues raised by the Eddington study**

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<sup>33</sup> HM Government, *PSA Delivery Agreement 5*, October 2007, p4

<sup>34</sup> details of the *Eddington Study* can be found in HC Library standard note [SN/BT/4208](#)

<sup>35</sup> op cit., *PSA Delivery Agreement 5*, p3

**in any obvious manner. In our judgement, there is no clear link between the new PSA targets and the Eddington priorities.**<sup>36</sup>

The new PSAs were used in the Department for Transport's 2009 annual report. The most recent report, from autumn 2009, states:

Indicator 1

**By 2010-11 minimise increases in journey time into the 10 largest urban areas in the morning peak time, accommodating an average increase in travel of 4.4 per cent within an average increase of 3.6 per cent in person journey times per mile.**

The performance data for 2008-09 shows an improvement in person journey times, the third year in succession under the indicator. This is likely to be a consequence of the lower than expected rise in traffic volumes linked to the recession, the interventions implemented by the local authorities and other factors such as road works.

[...]

Indicator 2

**Over the three years to 31 March 2011 achieve 1.7 million vehicle hour delay savings from new interventions on the strategic road network implemented over the same period.**

Progress against this target is firmly on track. At the end of March 2009, the Highways Agency had delivered a total estimated annual saving of over 0.6 million hours of delay across the strategic road network. This was achieved by implementing the 31 interventions in the Agency's 2008-09 Reliability Delivery Plan. An updated Delivery Plan has been developed for 2009-10, which forecasts a further saving of almost 0.7 million hours of delay by the end of March 2010.<sup>37</sup>

#### **4 Views of the Coalition Government, 2010-**

In March 2010 the Transport Committee published a report on the performance of the Department for Transport. Again it criticised the way that the Department measured its progress against its Departmental Strategic Objectives (to which the PSAs contribute). In particular, it stated that:

We are not convinced ... that progress against important and complex objectives can be adequately assessed on the basis of a handful of indicators. We note above the limited measurement of support for economic growth [to which the congestion reduction targets relate].<sup>38</sup>

The Department for Transport's response to the Committee's report was published in October 2010, under the new Conservative-Liberal Democrat Coalition Government. In response to the Committee's concerns about the reporting structure it said:

We continually strive to improve our reporting system, which will be modified to reflect the new Government's priorities following the Comprehensive Spending Review. We

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<sup>36</sup> Transport Committee, *Department for Transport Annual Report 2007* (seventh report of session 2007-08), HC 313, 13 June 2008 [emphasis in original]

<sup>37</sup> DfT, *Autumn Performance Report 2009*, Cm 7737, December 2009, p26

<sup>38</sup> Transport Committee, *The performance of the Department for Transport* (fourth report of session 2009-10), HC 76, 4 March 2010, para 45

will carefully consider the committee's recommendation and specific comments as part of this work.<sup>39</sup>

The government does not appear to have made any further statement as yet about its approach to traffic reduction and reporting.

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<sup>39</sup> [Government response to the Committee's Fourth Report of Session 2009–10](#) (third special report of session 2010-11), HC 549, 28 October 2010